

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|-----------------|---|-----------------------------------|
| In Re: |) | CASE NO. 23-41881 |
| |) | Chapter 13 |
| |) | Motion to Extend Stay |
| Kim Y Jackson |) | |
| Debtor |) | Hearing Date: 06/29/23 |
| |) | Hearing Time: 11:00 AM |
| Diana Daugherty |) | Courtroom 7 North |
| |) | |
| Trustee. |) | William H Ridings, Jr., |
| |) | 2510 S. Brentwood Blvd., Ste. 205 |
| |) | Brentwood, MO 63144 |

Motion to Extend the Automatic Stay

Comes now, the above Debtor through her attorney has requested that she file a Motion to Extend the Automatic Stay states as follows:

1. Debtor filed the above captioned case in good faith on May 31, 2023.
2. Debtor filed previous case on May 31, 2023 being case #23-41129 that was dismissed on April 17, 2023 for failure to file a Chapter 13 Plan, Schedules, Statement of Financial Affairs, and Form (B122)..
3. Pursuant to 11 USC Section 362(c)(3)(A) the automatic stay will expire on the 30th day after filing the above captioned case.
4. The court may extend the automatic stay for the life of the case pursuant to 11 USC Section 362 (c) (3)(B).
5. Debtor's current case is filed in good faith. Debtor has filed all necessary schedules and paid all filing fees.
6. If the automatic stay is not extended, Debtor could lose their residence due to foreclosure.
7. Debtors change in circumstances is that she has filed all Schedules, Statement of Financial Affairs, Form (B122), and a Chapter 13 Plan.

Wherefore, Debtors respectfully requests that this court continue the automatic stay in this case to the conclusion of the case, and for any and all further relief which this Court deems just and proper in the premises.

Date: June 05, 2023

Respectfully submitted,

/s/ William H. Ridings, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically on **June 05, 2023** with the United States Bankruptcy Court and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I hereby certify that a true and correct copy of the foregoing document was filed electronically on **June 05, 2023** with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully prepaid, addresses to those parties listed on the Court's Manual Notice List and listed below on **June 05, 2023**.

: /s/ William Ridings, Jr.,

Kim Y Jackson
5947 Hamilton Terrace
St. Louis, MO 63112

See Attached Matrix